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January 22, 2024

*Via ECF*

Hon. Stewart D. Aaron  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application GRANTED. No later than January 31, 2024, the parties shall file their *Cheeks* submission and proposed settlement agreement.

SO ORDERED

Dated: January 23, 2024

**RE: Davis, et. al. v. T&T Express Shipping, LLC, et. al.,**  
**Case No.: 22-cv-01936 (VSB)**

Dear Judge Aaron:

We represent all Plaintiffs in the above-referenced matter. The Parties reached a settlement agreement after a mediation session with the Court on November 2, 2023. The first deadline for the Parties to submit a proposed settlement and a motion for settlement approval, pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015), was January 3, 2024, which this court extended to January 17, 2024, in response to the parties' joint request for a brief extension of same.

On Friday, January 19, 2023, this court ordered that by Monday, January 22, 2024, "the parties shall either file their *Cheeks* submission or a joint letter motion requesting an extension of time, which shall explain the reason(s) for the untimely filing and basis for an extension of time."

The undersigned sincerely apologizes to the Court for not abiding by the January 17, 2024 deadline. The undersigned was having difficulty reaching one of the plaintiffs to confirm his acceptance of the drafted settlement agreement and was hopeful that contact would be made with the plaintiff before the end of last week. The undersigned should have notified the Court of this challenge rather than allowing the deadline to pass, without a submission. I regret any inconvenience this may have caused the Court, and I can assure the court that it will not happen again.

In further compliance with this Court's recent order, the parties now respectfully a second and final two-week extension of time, to January 31, 2024, to file the *Cheeks* submission and proposed settlement agreement to this Court. I am confident this will give the undersigned sufficient time to reach all the plaintiffs and address any other issues pertaining to the proposed settlement agreement. We thank the Court for its time and attention.

Respectfully submitted,

BELL LAW GROUP, PLLC

/s/: Chaya M. Gourarie  
Chaya M. Gourarie, Esq.